

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LANDSCAPE CONSULTANTS OF
TEXAS, INC., and METROPOLITAN
LANDSCAPE MANAGEMENT,
INC.,

Plaintiffs,

v.

CITY OF HOUSTON, TEXAS, and
MIDTOWN MANAGEMENT
DISTRICT,

Defendants.

Civil Action No. 4:23-cv-03516

NOTICE OF RULE 30(b)(6) DEPOSITION

TO THE PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. (30)(b)(6), Plaintiffs, by and through their counsel, will take the deposition upon oral examination under oath of Defendant City of Houston's Person(s) Most Knowledgeable on the matters and documents, electronically stored information, or objects as set forth below. The deposition will be conducted on Monday, September 30, 2024, beginning at 10:00 a.m. CDT at the offices of Husch Blackwell, 600 Travis Street, Suite 2350, Houston, TX 77002. The deposition will be recorded by stenographic means and shall be taken before a court reporter or other person duly

authorized to administer oaths. This deposition is subject to a protective order, Dkt. 56.

The matter to be examined will be:

- 1) The City of Houston disparity study produced by Colette Holt & Associates, Bates numbers CONFIDENTIAL COH0001082-COH0001222, including the decision to commission the disparity study, the decision to award the contract for the disparity study to Colette Holt & Associates, the decision to end the disparity study contract with Colette Holt & Associates, and the decision not to adopt the Colette Holt & Associates disparity study.

In addition, Defendant or its deponent(s) shall provide to the undersigned counsel in advance or bring to the deposition the following documents, electronically stored information, or objects reasonably within its possession or control:

- 1) All documents not already produced relating to the City of Houston disparity study produced by Colette Holt & Associates, Bates Numbers CONFIDENTIAL COH0001082-COH0001222, including monthly progress reports.

DATED: August 28, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on August 28, 2024, a copy of the foregoing document was sent via electronic mail to the following individuals:

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